

***Remarks***

Upon entry of the foregoing amendment, claims 1-24 are pending in the application, with claims 1, 6, 11, 16, and 20 being the independent claims. New claims 20-24 are sought to be added. These changes are believed to introduce no new matter, and their entry is respectfully requested.

The newly added claims 20-24 are believed to be clearly distinguished from the prior art. The preamble of newly added independent claim 20 recites the transition "consisting essentially of." Applicants respectfully submit that the cited art does not teach or suggest the specific combination of elements recited in new claims 20-24. Applicants therefore respectfully request prompt allowance of these claims.

Applicants continue to maintain that the prior rejection of the remaining claims 1-19 is improper. The P-type capacitor of Tarabbia is defined as shown in FIG. 4 as a semiconductor device with a P<sup>+</sup> doped gate electrode paired with N<sup>+</sup> doped source/drain terminals. Therefore, modifying Ohwa by utilizing Tarabbia's P-type capacitor does not result in the present invention. Furthermore, Tarabbia does not provide any motivation to replace an N<sup>+</sup> doped gate electrode of Ohwa with a P<sup>+</sup> doped gate electrode. Hence, the subject matter as a whole would not have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains, as would otherwise be required for a rejection under 35 U.S.C. §103(a).

For at least the reasons stated above, all pending claims are patentable over the cited art. Applicants therefore respectfully request that all pending claims be passed to allowance.

***Conclusion***

Prompt and favorable consideration of this Amendment is respectfully requested. Applicants believe the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Donald J. Featherstone  
Attorney for Applicants  
Registration No. 33,876

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1100 New York Avenue, N.W.  
Washington, D.C. 20005-3934  
(202) 371-2600

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